

**COHEN, FRANKEL & RUGGIERO, LLP**  
ATTORNEYS AT LAW  
20 VESEY STREET, SUITE 1200  
NEW YORK, NEW YORK 10007  
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN  
PETER M. FRANKEL  
LOUIS J. RUGGIERO  
MINA KENNEDY  
GILLIAN M. FEEHAN\*  
\*ADMITTED IN NJ AND PENDING ADMISSION IN NY

35-07 90<sup>TH</sup> STREET  
JACKSON HEIGHTS, NEW YORK 11372  
(718) 898-4900 • FAX (718) 898-0093  
PLEASE DO NOT REPLY TO THIS OFFICE

June 22, 2023

**VIA ECF**

The Honorable Alvin K. Hellerstein  
Senior United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED.

/s/ Alvin Hellerstein  
U.S.D.J.  
June 22, 2023

**Re: *United States v. Shangzhen Wu*  
23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

Please recall that I represent Mr. Shangzhen Wu in his defense of the above-referenced matter. Mr. Wu met his bond conditions and was released from custody on Friday, June 9, 2023. On June 12, 2023, after consulting with United States Pretrial Services, I submitted a letter motion requesting that Your Honor grant a temporary modification of Mr. Wu's bond conditions to permit him to leave his home to attend to important, local errands. Your Honor denied the defense's motion without prejudice on June 13, 2023, pending the consent of the Government and Pretrial Services. Yesterday, June 21, 2023, A.U.S.A. Jerry Fang advised that the Government and Pretrial Services have no objection to the proposed, temporary modification. Therefore, for the reasons that follow, I respectfully request that Your Honor grant a temporary modification of Mr. Wu's bond conditions to permit him to leave his home while on home incarceration to attend to important errands at a local Chase Bank and a local T-Mobile cell phone store.

On March 2, 2023, Mr. Wu was arraigned before United States Magistrate Judge Gabriel W. Gorenstein. Judge Gorenstein set conditions of release on a \$50,000.00 personal recognizance bond to be co-signed by two financially responsible persons and secured by \$5,000.00 cash. Judge Gorenstein also set the following conditions of release: supervision by United States Pretrial Services ("Pretrial") as directed; surrender all travel documents and no new applications for travel documents; travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; home incarceration; location monitoring as directed by Pretrial; and no contact with witnesses or alleged victims. Judge Gorenstein further ordered that Mr. Wu cannot possess the identifying information of others or open any new bank accounts, and if Mr. Wu is released, he is to reside at his residence in Jersey City, New Jersey.

**Cohen, Frankel & Ruggiero, LLP**

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If granted permission, Mr. Wu would travel to a local T-Mobile store to re-activate his cell phone service on a new device. Mr. Wu is presently using a temporary phone number with a prepaid SIM card, but he needs to reactivate his cell phone service with his original phone number in order to be able to access important, personal accounts and to electronically shop for and order basic essentials such as food. Additionally, Mr. Wu would travel to a local Chase Bank to regain access to his personal funds so that he can pay his living expenses while on release. Mr. Wu would then promptly return to his residence.

Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Jerry Fang (via ECF)  
Mr. Shangzhen Wu